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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

MESERET T. SADO d.b.a. JBS Residential
Living Program,

Plaintiff,

v.

STATE OF OREGON DEPARTMENT OF
HUMAN SERVICES Seniors and People
with Disabilities; MULTNOMAH COUNTY;
and BARBARA SOUTHARD, KAREN
CURRY, SHARI DAVIS, and SHARELL
COLLINS in their individual capacities,

Defendants.

Civ. No. 10-1050-ST

PLAINTIFF'S RESPONSE TO
DEFENDANTS MULTNOMAH COUNTY,
KAREN CURRY, SHARI DAVIS and
SHARELL COLLINS' MOTION TO
DISMISS

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CURRY, SHARI DAVIS and SHARELL COLLINS' MOTION TO DISMISS

Ms. Sado concedes all four of the motions and has prepared a proposed Second Amended Complaint which addresses all of the issues raised in the motions. Ms. Sado seeks permission to file the Second Amended Complaint and has sought permission from both defense counsel to file the Second Amended Complaint. Counsel for the State of Oregon and for Ms. Southard has consented to the amendment. Counsel for Multnomah County and defendants Curry, Davis and Collins has also consented.

Dated: December 16, 2010.

SMITH & FJELSTAD

By: /s/ Kerry M. L. Smith
Kerry M. L. Smith
OSB No. 88103
Lisa A. Amato
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Of Attorneys for Plaintiff

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